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ABSTRACT

This report outlines the National Policy Board (NPB) on Higher Education Institutional Accreditation's position on the state of higher education accreditation in the United States, in light of the many challenges faced by the current system of voluntary accreditation, peer review, and self-regulation. Federal and state governments, along with college presidents and others, are questioning the utility of voluntary accreditation and instituting organizations and procedures that may limit the independence of American colleges and universities. The report proposes that the NPB create a new organization, the Higher Education Accreditation Board (HEAB), and charter it to protect institutional independence and advance the public interest by: (1) defining common institutional eligibility requirements describing the essential characteristics of institutions seeking membership in regional accrediting entities; (2) requiring regional accrediting entities seeking recognition from the HEAB to demonstrate that their standards conform to a common core of accreditation standards; (3) encouraging member institutions and accrediting agencies to provide substantive public reports on the results of reviews of institutions; and (4) establishing a board with a majority of public members and heavy representation by institutional chief executives to govern HEAB. (MDM)

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INDEPENDENCE, ACCREDITATION, AND THE PUBLIC INTEREST

Special Report on Accreditation

October 1994

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National Policy Board on Higher Education Institutional Accreditation

Washington, DC

INDEPENDENCE, ACCREDITATION, AND THE PUBLIC INTEREST

Special Report on Accreditation

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Preface

In June 1993, the heads of nine regional accrediting commissions and seven national higher education associations established the National Policy Board on Higher Education Institutional Accreditation (NPB) to consider major problems facing accreditation and how to solve them. This document is a status report on the NPB's discussions and decisions as of October 1994.

The National Policy Board believes higher education needs a searching and intensive conversation about the purposes and role of accreditation as the principal means of protecting voluntary self regulation and promoting institutional quality. This special report is designed to lay the foundation for that conversation at a variety of national and regional meetings over the next six months.

The NPB understands that some members of the academic community may question the need for the ambitious changes outlined in this report. This document explains the need for change, outlines unresolved issues, and invites reactions and suggestions. Educators, members of the public, and policy makers should feel free to provide comments, suggestions, and responses to the NPB and to regional accrediting entities. These comments will guide the NPB's work in the future.

Comments to the National Policy Board, as well as copies of those sent to national associations and regional accrediting agencies, should be addressed to:

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A Challenge to the Leaders of American Higher Education

Convinced that academic accreditation and the independence of the nation's colleges and universities were threatened, the heads of nine* regional accrediting commissions and seven national higher education associations established the National Policy Board on Higher Education Institutional Accreditation (NPB) in June 1993 to consider accreditation alternatives for the future. The onerous federal regulations that faced the higher education community at the time of the NPB's creation for the most part have been held in check, but underlying issues such as the government's urge to regulate and the credibility of accreditation remain to be addressed.

Institutional presidents, representing regional accrediting commissions and association boards of directors, have participated in the deliberations of the National Policy Board. The group has worked hard, meeting five times and also participating in a conference on accreditation sponsored by the Education Commission of the States at the Johnson Foundation's Wingspread Center in Wisconsin. Between meetings, as many as eight committees labored on the challenges facing accreditation. Our discussions have been substantive, intense—frequently difficult.

This report outlines the results of the National Policy Board's deliberations to date. In brief, the NPB proposes that higher education leaders create a new organization, the Higher Education Accreditation Board, and charter it to protect institutional independence and advance the public interest by:

- defining common institutional eligibility requirements describing the essential characteristics of institutions seeking membership in regional accrediting entities;

- requiring regional accrediting entities seeking recognition from the Higher Education Accreditation Board to demonstrate that their standards conform to a common core of accreditation standards;

- encouraging member institutions and accrediting agencies to provide substantive public reports on the results of reviews of institutions; and

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* The number of regional accrediting commissions represented on the National Policy Board was reduced to eight when membership was limited to those that accredit higher education institutions.

- establishing a board with a majority of public members and heavy representation by institutional chief executives to govern HEAB.

Of necessity, a document such as this represents an effort to reach a broad consensus. Every member of the National Policy Board would write a different report—and some harbor reservations about details of our work. On the broad themes of this document, however, NPB members are unanimous. Accreditation needs an effective new national body; common eligibility requirements and core standards make sense in a regional structure; public credibility in higher education's ability to regulate itself must be restored.

The members of the National Policy Board stress that the major alternative before higher education is not a choice between accreditation as it now exists and the Higher Education Accreditation Board. Congress stands ready to put an end to accreditation as we have known it. The most significant choice we face is between stronger, more accountable, self regulation and more restrictive and onerous government intrusion.

Hence we issue this challenge to institutional leaders: Join us in the effort to create a more effective system of voluntary accreditation in the United States. Despite our sense of urgency, these proposals cannot be put in place without widespread support on your campuses. Just as representative government relies on the consent of the governed, accreditation depends on your consensus.

In the hope of promoting the widest possible discussion of these issues—and improving our final recommendations—the National Policy Board issues this progress report on where it stands, what it thinks needs to be done, and where it still needs guidance. We invite all who care about the future of American higher education to join us in the discussion.

Robert H. Atwell, Co-Chair
National Policy Board
President
American Council on Education

James T. Rogers, Co-Chair
National Policy Board
Executive Director, Commission on Colleges
Southern Association of Colleges and Schools

Independence, Accreditation, and The Public Interest

American higher education is acknowledged to be the envy of the world. The nation's 3,400 accredited two-year and four-year colleges and universities enroll about 15 million students annually, about one-quarter of all postsecondary students in the world. These institutions are the doorways through which millions pass in their search for a better life. They develop the skilled intelligence that a complex, growing modern economy requires. They lead the world in the number of Nobel Laureates on their faculties. In a society increasingly worried about the quality of its education system, Americans understand that their institutions of higher education are, by any standard, world class.

Voluntary self regulation through accreditation is one of the characteristics that distinguishes American colleges and universities. Throughout its century-long history, accreditation has succeeded in distinguishing secondary school programs from undergraduate programs, separating legitimate institutions from the illegitimate, and helping colleges and universities improve themselves through periodic "reality checks" of their strengths and weaknesses. In doing so, accreditation has helped assure the public, professional bodies, and institutional leaders that institutions enjoying accreditation's stamp of approval genuinely offer high-quality educational programs.

Today, all of that is in jeopardy. The system of voluntary accreditation, peer review, and self-regulation is under assault by critics in Congress and the public:

- 1992 amendments to the Higher Education Act sought to federalize accreditation.
- Congress has authorized, and states are establishing, new State Postsecondary Review Entities (SPREs) authorized to conduct top-to-bottom reviews of any institution tripping over any of 11 "triggers" defined in the law.
- College presidents voice growing dissatisfaction with the increasing number of accrediting agencies and the demands they place on institutions.
- The national body trying to speak for accreditation, the Council on Postsecondary Accreditation (COPA), dissolved at the end of 1993.

In short, the challenges facing accreditation are formidable. The nation's colleges and universities are at the point where they risk losing voluntary accreditation as a quality-assurance and self-improvement tool. The implications of this state of affairs extend far beyond the concerns of accreditors to affect the independence of every college and university in the United States and public confidence in the integrity of our institutions.

The issue is not that regional accreditation has failed, but that national demands on the accreditation system have changed dramatically. The problem lies not in higher education's lack of commitment to quality, but in public understanding of the processes by which it safeguards quality. The challenge before us is only in part the need to hold government intrusion at bay—the real challenge is the imperative to restore public confidence in accreditation as the principal means by which institutions of higher education regulate themselves.

Meeting the challenge of restoring public credibility will require accreditation to develop more effective accountability mechanisms. It will require demonstrating that accreditation means something. It will call for evidence that regional accrediting entities are functioning at acceptable levels—and that their policies, practices, and procedures meet acceptable standards. It will require an effective and powerful advocacy role for accreditation. And it will demand more effective research and development on the processes of accreditation so that accrediting entities can evaluate their own effectiveness and make whatever changes are required.

The Dimensions of the Challenge

Several circumstances have brought us to the point where we find ourselves today:

- Lack of a shared sense of what accreditation is and what it is supposed to assure.
- Questions about the rigor and consistency of accreditation in a regional structure.
- Federal dissatisfaction with the government's ability to monitor student assistance—and an attempt to shift that burden to accrediting entities.
- Growing concern among college and university presidents about the demands of specialized accreditation.
- Internal disputes within higher education that left COPA, ostensibly authorized to coordinate policy, in a weak and ineffectual position.

These five considerations—in essentially this form—have bedeviled accreditation in one way or another for the last century (see Appendix B, "The Search for Self-Governance"). The history of accreditation is the story of several powerful constituencies—

institutions, regions, professional bodies, national education associations, and government—each advancing different legitimate interests, seeking harmony in an uneasy balance. Not one of these problems is new.

Accreditation: What Is It? When academic leaders speak of "accreditation," they understand exactly what they are describing. At its heart, it is a collegial relationship in which peers help institutions assess and improve themselves. It relies heavily on peer reviews and site visits to confirm or invalidate the self-studies of individual institutions. It concentrates on such traditional issues as institutional goals, governance, curriculum, faculty, student support services, and the library. It explores whether finances, facilities, and equipment are sufficient to support the institution's goals and curriculum. It examines whether the institution deals forthrightly with its students in terms of academic mission, promises about instructional programs, and financial stability and integrity. In recent years, it increasingly has turned its attention to issues of institutional quality and student achievement.

This entire process is designed to provide a warrant of institutional quality—and this process is simultaneously accreditation's greatest strength and its greatest weakness.

Accreditation's great strength is that it is, in the argot of today's business world, a process of Continuous Quality Improvement. It is a journey, not a destination—indeed, the journey never ends but continues, institution by institution, decade by decade. The product of this process is a stamp of institutional approval, accepted, largely without question, throughout the academic world.

Accreditation's great weakness is that beyond the boundaries of the campus, this process is difficult to describe in meaningful ways. The best-intentioned members of the public are confused about what accreditation really is. Critics voice a complaint that many accreditors consider out of date: Accreditation worries too much about "inputs" (e.g., finances and library holdings) and not enough about "outputs" (i.e., the quality of graduates or the value added to the students admitted).

The ambiguity of the term beyond the campus has led to different definitions of what accreditation is, and divergent expectations about what it can accomplish. The public is inclined to believe that a warrant of institutional quality should include a warranty on graduates. Legislators have assumed for more than 40 years that, as the gatekeepers to the world of higher education, accreditors also should monitor institutional compliance with federal student aid regulations. Protests from the academic community that accreditation was developed with neither of these purposes in mind fall on deaf ears.

Part of the difficulty is that the process is a private exercise, carried out under assurances of confidentiality, not a public discussion. Fairly or unfairly, it has been compared with the election of a pope in which the College of Cardinals signals its decisions to a waiting and anxious public with a plume of white smoke (accreditation) or black smoke (non-accreditation). In today's consumer society, the American people expect more: what is good enough for the faithful is not good enough for the general public or its policy makers.

Federal dissatisfaction. Unrealistic legislative expectations for accreditation have led to federal unhappiness about the extraordinary rates, and associated budget costs, of defaults on guaranteed student loans. Default rates skyrocketed in the 1980s and reached their peak of nearly $3.5 billion just as Congress was taking up amendments to the Higher Education Act.

Although high default rates and costs are demonstrably concentrated in fringe proprietary schools, Congress adopted a shotgun solution, embedded in the 1992 amendments to the Higher Education Act, that created an unprecedented structure of state oversight of higher education (SPREs) and tried to federalize accreditation at the same time.

As David A. Longanecker, assistant secretary of education for postsecondary education, recently wrote forthrightly:

The 1992 Amendments...for the first time put into law requirements affecting the structure, operating procedures, and standards of accrediting agencies that limit the independence of these private entities.... It is also true that the statute raised fundamental questions concerning the control of higher education in this country.

The message is clear: Congress and the Department of Education are eager to regulate. If higher education is to withstand the regulatory urge, it must put its house of accreditation in order.

Number of accrediting agencies. Simply with respect to institutional accreditation, higher education deals with six associations, and nine commissions internal to them, organized by region.* In addition, another seven accrediting entities operate on a national level for entire institutions: bible studies, business, distance education, health education, rabbinical and talmudic education, theology, and trade and technical schools.

But that is just the beginning of the story. When the American Medical Association was founded more than a century ago, higher education had little conception of what lay ahead. Other professions rapidly followed suit. Today, the number of specialized accrediting agencies exceeds 60 and they accredit 109 different academic programs—ranging from acupuncture, blood banks, architecture, cosmetology, counseling, dance, engineering, and funeral services to journalism, law, medicine, medical illustrators, speech-language pathology and audiology, teacher education, and theatre.

One small comprehensive university (enrolling about 4,500 students) deals with 17 different accrediting groups in addition to its regional accrediting body. Like many institutions in a similar position, this institution goes through several reviews each year,

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* The six regional accrediting bodies are: Middle States Association of Colleges and Schools, New England Association of Schools and Colleges, North Central Association of Colleges and Schools, Northwest Association of Schools and Colleges, Southern Association of Colleges and Schools, and the Western Association of Schools and Colleges. Most of these bodies have organized internal commissions responsible for special types or levels of institution—secondary schools, community colleges, vocational and technical institutions, and four-year colleges and universities—and nine of these commissions in the six regions concentrate exclusively on postsecondary institutions.

incurring heavy costs in direct expenses and staff time. Presidents in this situation complain that specialized accreditation threatens to balkanize the institution, with multiple reviews deteriorating into special interest pleading.

Specialized accrediting agencies, on the other hand, argue convincingly that their efforts not only have helped improve accrediting practice, but also are essential to improving professional education, buttressing state licensing, and protecting the public by policing "fly-by-night" educational programs.

Regional variation. One of the significant challenges facing accreditation is the belief that accreditation means different things in different regions because standards and procedures vary. In part this perception grows out of one of accreditation's desirable features—the regional, non-governmental nature of the enterprise. Regional accrediting entities developed as the nation and higher education developed, their character and traditions shaped by the cultures of the regions and institutions that brought them into being. Regionalism is not simply part of the history of accreditation, it is part of its fabric.

Some maintain that regionalism is not one of accreditation's flaws but one of its strengths. The advantages of a regional structure, they say, are subtle but powerful. Regionalism encourages sensitivity to local needs and characteristics. It allows for regional experimentation in accreditation—from which other regions benefit. It encourages mutually beneficial relationships between accreditors and affiliated institutions—particularly in smaller regions. All of this should be preserved, they argue. Some of the issues in the Northeast may be different from those in the far West, as may be true for the Midwest, the South, and the Southwest. For this reason, they say, a national accreditation template will not work.

Nonetheless, the perception persists that regional variation is a significant problem. The perception itself is a challenge, because if significant differences exist in regional standards, accreditation's allies are placed in a nearly untenable position. Relying on a regional structure, accreditors issue a nationwide certificate of quality—but they are thought to do so on the basis of different standards, procedures, and processes, applied with varying degrees of rigor.

Advocates of regional accreditation believe this perception is misplaced. Although regional criteria and standards are expressed in various ways, close examination shows that they have more similarities than differences. Thus, one challenge facing accreditation is to convince the public and policy makers that regional standards do not differ as greatly as they believe.

Internal Disputes and a Weak National Presence. At the national level, accreditation has never enjoyed a strong voice. Since at least 1938, one weak body after another inherited ineffectual mandates from its predecessors.

The latest national body, the Council on Postsecondary Accreditation (COPA), could point to some significant accomplishments during its twenty-year tenure. It advanced evaluation, worked to clarify and limit the federal role in private accreditation,

and mounted some promising research in areas such as standards, educational outcomes, and accreditation of distance learning.

On the other hand, it did little to advance one of its original priorities, a national information and education program about accreditation, and rarely questioned the practices of recognized accrediting entities.

Above all, the very campuses on whose behalf COPA labored had no direct role in its financing. It was an association of associations, not an association of institutions. When several accrediting bodies announced their intention to withdraw from COPA in 1993, the organization had no place to turn and few campus defenders.

A Vision of an Effective System of Accreditation

But if COPA had no place to turn in 1993, accreditation does in 1994. After more than a year of work—a period marked by intense effort, heated discussion, and principled debate about how to proceed—leaders of the regional accrediting bodies and national higher education associations, as well as many institutional chief executives, have begun to coalesce around a vision of accreditation for the future.

It is a vision of an effective system of accreditation that is true to the history and traditions of voluntary self-regulation, which has grown and changed as the needs and imperatives of our society and our institutions have grown and changed. This new, more effective system would be much clearer about its purposes, more specific about its content and standards, and more rigorous, responsive, and reflective in its processes.

Purposes. The purposes of such a system would continue to be organized around providing public assurance of the quality of individual institutions and stimulating institutional improvement by helping institutions develop effective self-assessment plans tied to mechanisms for change. It would inform the public about the state and progress of higher education collectively. Above all, it would be a non-governmental, private process serving both public and private purposes simultaneously.

Content and Standards. Our vision of accreditation builds on a foundation already in place. An effective system of accreditation *must* evaluate resources, processes, governance, and institutional objectives appropriately. It *must* respect and strengthen distinctive institutional missions. But it also could do more. It should encourage the evaluation of student learning, and, most significantly, it should establish uniform eligibility criteria and meaningful core standards, common to institutions wherever they are located.

Process. Here, the NPB's vision responds directly to one of the great challenges facing accreditation: the perception that its processes are both too insular and too fragmented. Once again, a more effective system could be built on the foundation already laid. An effective system should rely on the traditional pillars of self regulation:

institutional self-assessment and peer review. But the process could be better. Even making full allowance for appropriate differences in emphases, accreditation should be more consistent across accrediting agencies. It should work toward cost effectiveness and minimal intrusion into institutional operations by providing for greater coordination between institutional accreditors and accreditors of special programs.

Above all, an effective process would respond to the concerns of the many constituencies served by higher education—both by being more visible to the public and by providing for timely and decisive actions in cases where institutions fail to meet minimum standards.

From Vision to Reality

A great deal of work remains before this vision becomes a reality. Difficult substantive issues remain unresolved. Practical and political challenges remain to be addressed. Nevertheless, with respect to the major issues identified in this paper, the NPB has made significant progress in several areas.

A New, Independent, National Body. The National Policy Board concludes that higher education's best protection against government intrusion in accreditation lies in establishing a new national body capable of demonstrating that higher education itself can monitor and improve accreditation and protect the public interest. This new body should advance the art and science of voluntary accreditation and buttress the independence of the nation's colleges and universities.

The members of the NPB have agreed unanimously to propose that institutions of higher education establish such a new body, tentatively named the Higher Education Accreditation Board (HEAB). The Higher Education Accreditation Board is best described in terms of the issues identified in this report and how the NPB proposes to distinguish this new body from its predecessor. Several things are apparent immediately from the comparison on the following page:

- Instead of a weak national body with limited authority, the National Policy Board proposes that higher education leaders establish a more effective national accreditation presence.

- HEAB should be an association of institutions, not an association of associations.

- In place of a board dominated by educators, the majority of the members of HEAB's board should be members of the public.

- The board's educational members should be drawn primarily from those best equipped to represent institutional interests, campus chief executive officers.

- HEAB should be chartered with broad, carefully defined powers to: see that recognition standards, policies, and practices are developed; evaluate accrediting entities; develop enforcement sanctions; establish its own budget and levy dues to be collected by the regional accrediting agencies; and carry out long-range planning and programs in governmental and public relations.

- HEAB should address the perception problem directly by clarifying confusion arising from variations in institutional eligibility requirements and accreditation standards. The core standards proposed for HEAB's consideration include a prominent emphasis on the quality of educational programs and student learning.

- HEAB should play a major role in reassuring the public about the integrity of the accreditation process by encouraging both public reports on each evaluation and reports by institutions on their educational effectiveness.

Under this proposal, which remains in draft form, the new national organization would be governed by a 21-member board, including 11 public members and 10 institutional representatives, at least seven of whom would be college and university chief executive officers. Its purposes would include ensuring quality in higher education through periodic recognition and evaluation of accrediting entities; seeing to the establishment and maintenance of common standards of good practice; ensuring the integrity and autonomy of non-governmental accreditation; promoting public trust in the accreditation process; conducting research on assessment, accountability, and the measurement of quality; and serving a governmental relations and public relations role on behalf of accreditation.

Moreover, the proposal envisions providing HEAB with authority to develop and apply enforcement sanctions against accrediting entities that fail to adhere to core standards, policies, and practices—as well as authority to establish policy regarding activities involving more than one accrediting agency, distance education, and accreditation of international education programs.

Uniform Eligibility Requirements and Core Standards. The members of the NPB have agreed unanimously that regional accrediting bodies should apply uniform eligibility requirements to colleges and universities seeking accreditation. NPB members also agreed unanimously to recommend to institutional leaders that colleges and universities around the country should be required to meet regional accreditation standards that conform to a common core of standards.

No issue absorbed as much attention during the discussions of the National Policy Board as the issue of eligibility requirements and core standards. In addressing these issues, the NPB adopted the recommendations of a committee of regional directors and their staffs who spent a year exploring how regional accrediting agencies might identify

and respond to concerns about the practices, policies, and procedures of regional accreditation, including the issue of standards.

After extensive discussion of the wisdom of recommending verbatim adoption of both eligibility requirements and core standards in all regions, the NPB decided to recommend adoption of the eligibility requirements but concluded that verbatim adoption of core standards would be a mistake. Instead, the NPB recommends that an accrediting entity seeking recognition from HEAB should assure that its accreditation standards conform to common core standards—which regional entities can adapt and add to, as required to meet regional needs.

To elevate the importance of student learning in the accreditation process, the NPB also adopted the thinking of the regional directors' committee to the effect that core standards should emphasize student learning. Among the proposed standards for learning:

- provide an undergraduate education that ensures competence in oral and written communication, scientific and quantitative reasoning, critical analysis and logical thinking, and technological literacy;

- clearly define a process for establishing and evaluating all educational programs, conduct evaluations on a regular basis, and integrate the findings into the institution's overall planning and evaluation;

- provide evidence that program reviews lead to the improvement of the processes of teaching and learning;

- identify and publish expected learning results for each undergraduate and graduate program and demonstrate that students completing the programs have achieved them; and

- document the technical and vocational competence of students completing technical and vocational programs.

In short, adoption of the National Policy Board's recommendations promises several benefits to the higher education community, regional accreditors, and the general public: First, accreditors can demonstrate convincingly that accreditation means the same thing in different regions because regions apply uniform eligibility requirements and assure that their standards conform to a common set of core standards. Second, the new emphasis on student learning in accreditation represents an effective response to critics' insistence that the process pay more attention to learning results.

Public Reports. A major aspect of the NPB's vision depends on an accreditation system that is responsive to the concerns of the many constituencies served by the nation's colleges and universities—a system that informs the public about the state of

Accreditation Issues and the Capabilities of National Voluntary Bodies: Comparison of COPA (Defunct) and HEAB (Proposed)

ISSUE	COPA	HEAB
Structure	Association of associations	Association of institutions
Dues	Accrediting associations	Institutions through accrediting entities
Governing Board	18 members; 7 accreditors; 7 campus CEOs; 2 members of public; 1 national association; and 1 faculty member	21 members: 11 members of public; 10 others—at least 7 will be campus CEOs
National Body's Authority	Recognize accrediting bodies—general authority to coordinate and review work of member bodies and review changes. Restricted to educational, scientific, research, and professional concerns	Recognize accrediting bodies—broad authority to develop standards, policies, and practices, evaluate accrediting entities, determine enforcement standards, adopt budget, and establish accrediting policy
National Accreditors	Members of COPA	To be determined
Regional Accreditors	Recognized by COPA	Recognized by HEAB
Specialized Accreditors	Recognized by COPA	To be determined
Regional Bodies' Authority	Accreditation	Accreditation
Standards	Regional	Core, regionally applied
Institutional Eligibility	Uniform within regions	Uniform nationally
Public Relations	Limited	Extensive public education effort
Governmental Relations	Limited—reactive	Extensive—pro-active
Research	Moderate	Major emphasis
Institutional Quality Assurance	Accreditation/non-accreditation by regional association	(1) Accreditation/non-accreditation by regional association (2) Public reports (3) Core standards on program quality and student learning
Sanctions	Withdraw recognition No other authority or policy	Withdraw recognition Board authority to develop policy

higher education in general and provides public assurance of the quality of individual institutions.

The members of the NPB want to stress the importance of the common standards and eligibility requirements as tools encouraging institutions to provide evidence or documentation of the results they claim. Few better means of encouraging responsible accountability to the public are available. When an institution demonstrates that it meets or exceeds these proposed standards, that institution and its regional accrediting association are in a position to make positive, supportable statements about institutional quality.

In the NPB's judgment, however, the vision of a more effective system of accreditation can become a genuine reality only with more forthright public reports from institutions and accrediting bodies about the results of the accreditation process on each campus.

No accreditation issue captures institutional attention more swiftly than the possibility of disclosing additional information about institutional quality. Although public reports are fraught with potential difficulties, the issue of public accountability is central to achieving a level of visibility and credibility for accreditation that the process simply does not currently possess. The NPB's consensus view is that self regulation depends upon developing an effective response to the legitimate public demand for more information.

The challenge remains one of finding a way through the thicket of conflicting perspectives. On the one hand, critics reproach accreditation for the confidential nature of the process, essentially equating confidentiality with a kind of secretiveness offensive to the public interest. On the other hand, institutional leaders and accreditors argue that accreditation is about both quality assurance and institutional self improvement. Without the principle of confidentiality, institutions and evaluators would not engage in a meaningful and candid appraisal with an eye toward self improvement.

The NPB believes this dilemma must be resolved. Because higher education serves so many diverse constituents, it is difficult to identify any universally satisfactory solution. Simply making self-study and site-visit reports available would be of limited value. Self-study reports typically run to several hundred pages. The NPB cannot believe that any member of the public needs or wants all that detail. On the other hand, every interested member of the public is entitled to more than a simple statement of accreditation awarded or withheld.

The problem can be solved only if different actors in the accreditation process—accrediting entities, the national body, and institutions themselves—share the responsibility for opening it up. Among the suggestions under discussion:

- Each accrediting commission should provide a public summary of its qualitative findings regarding individual institutions after each evaluation—and also inform trustees of the results of evaluations with a particular emphasis on institutional quality and its improvement;

- The regional accrediting community as a whole should issue periodic public reports on the achievements and strengths, as well as the deficiencies and problems, of American higher education.

- HEAB should fashion mechanisms, in both governmental and public relations, to encourage greater public understanding of, and confidence in, the processes of regional accreditation. Accreditation's credibility problem will not be resolved solely through advocacy, but a solid advocacy and public information campaign is part of the solution.

- Individual institutions themselves should, on a regular basis, provide information on their effectiveness in terms of program quality and student learning.

Of necessity, these possibilities are presented only in outline. The nature of reports from regional accrediting entities remains to be worked out. Beyond general approval of the idea that regional accreditors as a whole should issue periodic reports on American higher education—and that HEAB should create a strong advocacy role for itself—the National Policy Board has not tried to define the specifics of these activities. The members of the NPB also are convinced that each institution should decide for itself how best to provide information on effectiveness—for example, by assessing student accomplishment, evaluating achievement of institutional educational goals, or tracking student success after graduation.

In fact, these possibilities are deliberately suggestive rather than definitive. In this most difficult, frequently controversial, area, higher education needs to be careful and cautious. Developing the response should be a first order of business for the new Higher Education Accreditation Board through a broad participatory process, engaging all of the stakeholders in the accreditation discussion. But if care and caution are two important guidelines in this area, institutional leaders also must understand the imperative to proceed. The need to move with dispatch and responsiveness is equally important.

A Difficult Road Ahead

The members of the National Policy Board are under no illusion that implementing any of these proposals will be easy or accomplished without some controversy. The practical problems of establishing and securing the credibility of a new national, private body to implement the agenda outlined in this document are formidable. The NPB's deliberations have made it painfully aware of the difficult choices accreditation faces as it attempts to navigate the tricky cross-currents of institutional independence, accountability through accreditation, and the public interest.

Nor has the NPB resolved all of the problems defined at the outset of its work. Despite considerable progress in the past year, several complex issues remain to be addressed.

Recognition of Accrediting Entities. Recognition, a process of reviewing accrediting entities according to established criteria and procedures, leads the list of unresolved issues. Recognition issues for regional accrediting bodies can be resolved by academic leaders, however difficult the process of resolution may be. As discussed above, the NPB proposes that recognition of regional accreditors depend on the adoption and application of common eligibility criteria and assurances that regional standards conform to common core standards.

But both institutional accreditation of degree-granting proprietary and church-related institutions and specialized accreditation in professional fields present special problems. With respect to institutional accreditation, the NPB believes that many of the recognition criteria for regional accreditors can be applied to other institutional accrediting bodies. Both regional and national institutional accreditors share a common concern with the functioning of higher education institutions as a whole.

Specialized accreditation presents quite a different set of issues. Professional accreditation is part of an iron triangle of accreditation, state licensing requirements, and professional certification. These concerns are not susceptible to resolution by the higher education community alone—although it might act in concert with others, including state legislatures, licensing boards, and professional associations, to address them.

A confederation of specialized accrediting entities has suggested the establishment of a new national body similar in structure to COPA. The history of COPA's demise makes that suggestion an unacceptable alternative to the members of the National Policy Board. Something more is needed—although what that is remains to be seen and the NPB is in the process of examining alternatives.

The National Policy Board is now engaged in a planning process for recognition that includes: (1) conversations with a variety of organizations and accrediting entities; (2) development of proposed standards and procedures for recognition; (3) public comment; and (4) development of a proposed recognition program for the new organization.

Federal Regulation. Also unanswered at this time is the issue of how and when to respond to the changes in federal legislation related to accreditation in the 1992 higher education amendments. In support of the 1992 amendments, the Department of Education initially proposed regulations that went far beyond the authority granted by Congress and would have imposed more than 140 new requirements on accrediting bodies. A massive effort by the higher education community, including institutional leaders and accrediting officials, succeeded in removing several of the most objectionable features affecting accreditation. However, the underlying legislation remains flawed in concept, and final regulations on SPREs and on federal eligibility and certification remain problematic.

The NPB believes that changes in the legislation related to accreditation should be included in a comprehensive proposal from the higher education community that also includes recommendations on SPREs and federal regulations regarding eligibility and

certification. In addition, we believe this proposal should be grounded in several key principles:

- Accreditation should be a private process—voluntary, not governmental.
- The role of accreditation is to assure educational quality and institutional viability.
- The review and monitoring of compliance with federal student aid legislation should be a federal responsibility.
- Federal oversight of accrediting agencies should be limited to the application for recognition.
- Federal authority over accreditation standards should be eliminated.

The NPB believes that this agenda should be a top priority for the Higher Education Accreditation Board when it is established.

Other Issues. In similar fashion, the National Policy Board's proposals to date leave unanswered a number of difficult issues related to sanctions for non-cooperating accrediting entities, accreditation of emerging education delivery systems such as distance learning, international education, and dispute resolution among accreditors.

Despite these remaining difficulties, members of the NPB believe the proposals outlined in this special report represent a solid start toward reinvigorating accreditation as an essential tool of institutional improvement and quality assurance.

A Challenge

The recommendations outlined in this special report are not self-implementing. The National Policy Board enjoys no authority beyond the quality of its ideas and the feasibility of its proposals. No accrediting entity in the United States—nor any institution of higher education—is under any obligation to heed our advice, much less follow it.

Hence we issue this challenge to all who care about higher education and its future: Join us in this discussion. Examine the problems defined in this document and consider the alternatives. The problems are significant. The alternatives—breathing new life into COPA or additional government intrusion—are unattractive. We invite your support for a new Higher Education Accreditation Board, structured along the lines proposed here.

More than that, we solicit your advice. Can you enthusiastically support an organization such as the Higher Education Accreditation Board, organized along the lines we suggest? If not, what suggestions do you have? Are you comfortable with the standards and institutional eligibility requirements specified above—or do you have sugges-

tions for amending them? We understand that public reports on the results of accreditation are a new and intimidating possibility for some institutions; do you have a better idea or additional guidance on how to proceed?

Beyond issues related to the proposed organization, accreditation standards, and public reporting, what other counsel can you give us? How should HEAB relate to specialized accrediting entities? Should this new body possess authority to sanction accreditors for failure to live up to the public interest—and if it should, how should sanctions be structured? Is accreditation of international education and/or distance learning a priority concern—and if so, what role should HEAB play in resolving it? How would you propose that HEAB make a start in developing policy to address disputes between or among accrediting entities?

With your help, we can put in place a structure for accreditation that promises to secure it as a tool for institutional independence and protection of the public interest well into the next century. Without that assistance, we can do nothing. In the situation before us today, only one thing is certain: Higher education cannot afford to stand still. Should it choose to do so, institutional independence will be left to the mercies of those who tried to federalize accreditation in the first place.

Appendix A
National Policy Board on Higher Education
Institutional Accreditation

Robert H. Atwell (Co-Chair), President, American Council on Education
James T. Rogers (Co-Chair), Executive Director, Commission on Colleges, Southern Association of Colleges and Schools
James B. Appleberry, President, American Association of State Colleges and Universities
Charles M. Cook, Director, Commission on Institutions of Higher Education, New England Association of Schools and Colleges
Richard T. Ingram, President, Association of Governing Boards of Universities and Colleges
C. Peter Magrath, President, National Association of State Universities and Land-Grant Colleges
Joseph A. Malik, Executive Director, Commission on Colleges, Northwest Association of Schools and Colleges
Richard E. Mandeville, Director, Commission on Technical and Career Institutions, New England Association of Schools and Colleges
John C. Petersen, Executive Director, Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges
David Pierce, President, American Association of Community Colleges
Cornelius J. Pings, President, Association of American Universities
Howard L. Simmons, Executive Director, Commission on Higher Education, Middle States Association of Colleges and Schools
Patricia A. Thrash, Executive Director, Commission on Institutions of Higher Education, North Central Association of Colleges and Schools
David Warren, President, National Association of Independent Colleges and Universities
Stephen Weiner, Executive Director, Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges

Staff:
Billie Stewart, Consultant to the NPB

History of the Search for Self-Governance

DATE	EVENT
1784	New York Board of Regents established with broad regulatory, planning, and licensing authority over all educational institutions.
1847	American Medical Association founded to advance profession through state licensing and improving educational quality. In succeeding decades, other professions followed suit.
1867	Office of Education established to collect statistics, including data on the numbers of schools and colleges. Question of what is a "college" emerges.
1885	New England Regional Association established. (Middle States—1887; Southern and North Central—1895; Northwest—1917; Western predecessor—1924).
1906	National Conference Committee on Standards of Colleges and Secondary Schools formed to establish common standards for college admission and distinguish high schools from colleges.
1910	North Central Association develops first college and university accreditation effort.
1938	Joint Committee on Accrediting established by National Association of State Universities and the Association of Land-Grant Colleges (now AASCU and NASULGC) to confront proliferation of accrediting entities.
1947	National Commission of Regional Accrediting Agencies (NCRAA) founded by ACE.
1949	National Commission on Accrediting, founded by five major national associations, assumes responsibilities and files of 1938 Joint Committee.
1952	Public Law 82-250 tries to correct abuses in G.I. Bill by requiring U.S. Commissioner of Education to publish a list of "nationally recognized accrediting agencies."
1958	National Defense Education Act allows Commissioner to make unaccredited institutions eligible for student loans on advice of an advisory committee.
1964	Federation of Regional Accrediting Agencies for Higher Education (FRACHE) replaces NCRAA.
1968	Accreditation and Institutional Eligibility Staff (AIES) formed by Commissioner of Education to administer process for recognizing accrediting associations.
1972	Postsecondary vocational institutions approved by state agencies eligible for federal student aid.
1973	Council on Postsecondary Accreditation (COPA) formed; NCA and FRACHE dissolved.
1992	Congress creates State Postsecondary Review Entities (SPREs) to conduct reviews of institutions and imposes new requirements on accrediting agencies seeking recognition.
1993	COPA disbanded. Commission on Recognition of Postsecondary Accreditation assumes COPA's recognition function.
	National Policy Board on Higher Education Institutional Accreditation (NPB) established.